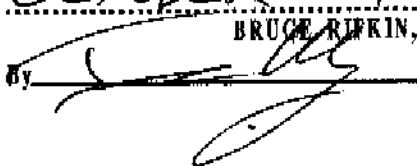


Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in The U.S.
DISTRICT COURT at Seattle, Washington.

OCTOBER 27 2005
BRUCE RIFKIN, Clerk
By  Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

IAN ELTON FUHR,
JASON JOHN FUHR,
ELIJAH VICTOR FUHR,
VICTOR EUGENE FUHR,
VALENTINO GUY,
CARLOS EDWARD FORD,
HENRY ORLANDO CASTRO,
COREY ALLEN BROWN,
ROY COLUMBUS GOLD III,
QUINTRAKEOUS CHERRY,
ERIC O'NEAL SOLIER,
MICHAEL DEVON RAY STEWART,
DEONDRA MCDUFFIE,
CARLOS MIGUEL WATSON,
DAVID WATKINS,
JASON LEE WARD,
JONAH TOPPS,
JOHN PELLUM,
PIILUA ETI,
MICHAEL R. COX,
JOHNNIE BROWN,
COLLEEN FLOCK,
SCOTT BRICKNER, and
ANTHONY STEVEN RODGERS,

Defendants.

CR05. 0391RSM

INDICTMENT



05-CR-00391-INDI

1 The Grand Jury charges that:

2 COUNT 1

3 (Conspiracy to Distribute Controlled Substances)

4 Beginning at a time unknown, but within the last five (5) years, and continuing
5 through on or about October, 2005, at Federal Way, within the Western District of
6 Washington, and elsewhere, IAN ELTON FUHR, JASON JOHN FUHR, ELIJAH
7 VICTOR FUHR, VICTOR EUGENE FUHR, VALENTINO GUY, CARLOS
8 EDWARD FORD, HENRY ORLANDO CASTRO, COREY ALLEN BROWN,
9 ROY COLUMBUS GOLD III, QUINTRAKEOUS CHERRY, ERIC O'NEAL
10 SOLIER, MICHAEL DEVON RAY STEWART, DEONDRA MCDUFFIE, CARLOS
11 MIGUEL WATSON, DAVID WATKINS, JASON LEE WARD, JONAH TOPPS,
12 JOHN PELLUM, PIILUA ETI, MICHAEL R. COX, JOHNNIE BROWN, COLLEEN
13 FLOCK, SCOTT BRICKNER, and ANTHONY STEVEN RODGERS, knowingly and
14 intentionally conspired with one another, and with others, to distribute controlled
15 substances: to wit, cocaine, cocaine base, oxycodone, and marijuana, substances
16 controlled under Schedules I and II, Title 21, United States Code, Section 812.

17 It is further alleged that this offense involved five (5) kilograms or more of a
18 mixture and substance containing cocaine, and fifty (50) grams or more of a mixture
19 and substance containing cocaine base.

20 All in violation of Title 21, United States Code, Sections 841(a)(1),
21 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C), and 846.

22 FORFEITURE ALLEGATION

23 Pursuant to Title 21, United States Code, Section 853, the Grand Jury alleges
24 that, as a result of the felony offense listed above, punishable by imprisonment for
25 more than one year, the above named defendants shall forfeit to the United States of
26 America any and all interest in property, real or personal, constituting, or derived
27 from, and proceeds obtained, directly or indirectly, as the result of said criminal
28 offense, and shall further forfeit any and all interest in property, real or personal, used

1 or intended to be used, in any manner or part to commit, and to facilitate the
 2 commission of such felony offense.

3 If any of the forfeitable property, as a result of any act or omission of the
 4 defendant cannot be located upon the exercise of due diligence, has been transferred or
 5 sold to, or deposited with, a third person, has been placed beyond the jurisdiction of the
 6 Court, has been substantially diminished in value, or has been commingled with other
 7 property which cannot be subdivided without difficulty, it is the intent of the
 8 United States, pursuant to Title 21, United States Code, Section 853(p), to seek the
 9 forfeiture of any property of the defendant, up to the value of the forfeitable properties.

11 A TRUE BILL

12 DATED: *OCTOBER 27, 2005*

15 Signature Redacted Pursuant to Policy

16 FOREPERSON

18 *Jeffrey C. McKay*

19 JOHN MCKAY

20 UNITED STATES ATTORNEY

22 *Douglas B. Whalley*

23 DOUGLAS B. WHALLEY

24 ASSISTANT UNITED STATES ATTORNEY

25 *Ronald J. Friedman*

26 RONALD J. FRIEDMAN

27 ASSISTANT UNITED STATES ATTORNEY